

Sussex Technical High School

A United States Department of Education National School of Excellence

Sandra L. Walls-Culotta, M.Ed.- Principal

Alien F. Lathbury, Jr. M.Ed. Assistant Principal Steven W.F. Huber M.Ed. Assistant Principal Assistant Principal

William Will(8-1) Collak, Milital Dean of Students

PLAINTIFF'S

EXHIBIT

March 8, 2004

Ms. Dorothy Houlihan School Psychologist Sussex Technical High School Georgetown, DE 19947

Dear Ms. Houlihan:

This letter is to address concerns I have regarding your unprofessional and negative behavior during our meeting on February 9, 2004. This was a fact finding meeting concerning your unproductive and negative interactions with other staff during an EDM meeting on February 5, 2004.

You expressed a concern as to why it was recommended that you have an STEA representative at the meeting and why it was necessary to be at this level. As I pointed out to you in the meeting, the reason you have the right to a representative is due to the fact that the outcome of the meeting could adversely affect the continuation of your position (Article X. Section D of the employment contract) and I wanted to make sure you were protected. The complaint I was investigating was directly related to your recommended areas of growth, developing cooperative working relationships with staff, in the performance appraisal dated 8/5/03.

You requested that the meeting be taped which I had agreed to as long a copy of the tape was given to me. This was stated at the beginning of the meeting. At the end of the meeting you requested the tape and stated that I could <u>not</u> have a copy of it. I repeated to you that I had stated in the beginning of the meeting I would only agree to tape the meeting as long as I received a copy of the tape. You indicated that things could be changed on the tape if I made a copy. This accusation that I would change things on the tape indicates to me that you do not trust me or the staff. You insinuated that we would carry out illegal acts. The decision on your part to refuse to let me have a copy of the tape demonstrates your inability to be cooperative and to work towards a positive working relationship.

During the February 9th meeting your verbal interactions were hostile and negative. You could not or would not focus on the purpose of the meeting and provide answers to my questions. Your remarks were degrading and unprofessional about staff and me. As I pointed out several times, we were there to discuss what was said and what behaviors occurred during the EDM meeting on February 5, 2004, concerning you interactions with staff especially Wendy McKeever. During the interview process when I specifically reviewed what was said, you would not stay on the topic, but would focus on what was being done wrong in your opinion by the staff and how the staff is "untrained". You stated that

Ms. Dorothy Houlihan 2 March 8, 2004

Wendy McKeever, the student's case manager, is not trained in the process, even though I stated that she has a Masters of Education in Special Education, has 20 years of teaching experience, and has been with our district for the past two and a half years. I stated in the meeting that there are proper ways to discuss how things should be done during a meeting so that the meeting is conducted in a non-confrontational manner.

You also stated that I told you previously to gather information on Shelly Billings and Alice Godwin-Smith so I could write up them up in order to be dismissed. This is not true. This statement is similar to another statement you had made during a conversation again on how Sussex Tech staff is untrained. During that conversation you told me that the former school psychologist told you that I was trying to get rid of him and that former staff members are glad not to work here. These types of statements cannot support a cooperative working relationship with administration, staff and your colleagues.

Making these statements indicates that you are <u>not</u> attempting to establish a positive and cooperative relationship. If fact these statements are destructive and illustrate your refusal to work cooperatively with other teachers and administrators to benefit our students. You continue to use falsehoods that provide hostile working environment, when we should be discussing how we can work more cooperatively together and what is working with in the program.

In addition to your remarks that the staff and I are incompetent to implement IDEA, you also stated that our procedures do not meet federal law requirements. As I stated in the meeting, these procedures have been developed from technical assistance with Delaware's Department of Education and that as a single school in the district our compliance with federal and state law is audited. To this you replied that we aren't following federal law, federal law overrides what the state says. If you constantly belittle the staff and indicate that they are not knowledgeable or trained enough in your eyes to carry out the tasks, it is impossible to develop a cooperative working relationship.

We have tried repeatedly to address your concerns over the law and we've even contacted our district attorney when issues have arisen. Please know that the Sussex Technical School District has never been reversed on an appeal made by a parent concerning a student's IEP or procedures that is used at Sussex Technical School District. In addition since Sussex Technical High School is the only school in the district it has been reviewed annually by the State of Delaware and has been found to be compliant with federal and state statutes.

Part of your lack of adjustment to our system seems to stem from your experiences in a county-wide system in another state. You have repeatedly pointed out how things were done in your previous job. Since the Delaware school system is composed of individual districts, Sussex Technical School District cannot and is under no obligation to conduct business as a county system.

It is critical that you must act in a professional manner and develop cooperative working relationships with staff. Unprofessional behavior as indicated is grounds for non-renewal of your contract.

Ms. Dorothy Houlihan

March 8, 2004

Please plan to meet with me prior to Friday, March 12, 2004, to develop an improvement plan regarding your hostile and negative interactions with teachers and administration and your overall unprofessional conduct.

Sincerely,

Sandra L. Walls-Culotta, M.Ed.

Principal

c: Personnel File

Carol Schreffler

My signature below certifies that I have received this letter. It does not indicate agreement or

disagreement with the contents of this letter.

Signature and Date



A United States Department of Education National School of Excellence

Sandra L. Walls-Culotta, M.Ed.- Principal

Allen F. Lathbury, Jr. M.Ed Assistant Principal Steven W.F. Huber, M.Ed. Assistant Principal

Larry J. Snyder, M.S. Assistant Principal William W. (Bill) Collick, M.Ed. Dean of Students

March 22, 2004

Dorothy Houlihan Sussex Tech High School Georgetown, DE 19947

RE: Failure to complete requests

Dear Ms. Houlihan:

This letter is to remind you that when given specific tasks they need to be completed in a timely manner. There have been three incidents since January where you have failed to carry out professional responsibilities.

In November 2003, you received a letter with a survey and a monetary supplement for completing the survey. When asked if you needed another copy of the survey in December, you stated you still had the first survey and that you would complete it. As of today's date Research Triangle Institute still has not received the survey.

Also, I met with you in January, and requested that you provide me a summary of your work activities for the first semester. You asked me if I requested other staff to do a summary of their work activities. As your supervisor, I have the right to request this information. Because of your type of work I am unable to observe your assessments or counseling of students. You were reminded again in a letter dated March 8, 2004 and as of today's date you have failed to provide me with a written summary of your first-semester work. The summary needs to document the number of students seen for initial psychological assessments, the number seen for reevaluations, the number of students counseled and how many times per week, the number of EDM meetings attended, and a brief summary of other meetings attended. You are to submit this written summary to me immediately.



March 22, 2004 Page 2 Dorothy Houlihan

Regarding another matter, you received a letter from me dated March 8, 2004, and were requested to sign the original letter and return it to me. As of today's date you have failed to do this. The letter dated March 8, 2004 needs to be signed and returned immediately.

These behaviors are insubordinate and are neglect of duty. This may result in the non-renewal of your contract. When given assignments it is important for things to be carried out. In addition questioning why I want a summary for your work is not a way to develop a working a relationship. These behaviors are unacceptable.

Sincerely,

Sandra L. Walls-Culotta, M.Ed.

Principal

c: Personnel File

Carol Schreffler, Assistant Superintendent

My signature below certifies that I have received this letter. It does not indicate agreement or disagreement with the contents of the letter.

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Signature and Date:



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Larry J. Snyder, M.S. Assistant Principal William W. (Bill) Collick, M.Ed. Dean of Students

March 22, 2004

Ms. Dorothy Houlihan Sussex Tech High School Georgetown, DE 19947

Dear Ms. Houlihan:

This letter is to reinforce the importance of the development of your Improvement Plan and to also address your request to have a DSEA representative at the meeting. Your Improvement Plan needs to be completed and in effect by Thursday, March 25, 2004. This is past the deadline of March 12, 2004 as stated in the letter dated March 8, 2004. It is imperative that an improvement plan be developed immediately. I have attempted to expedite this procedure; however, you have delayed this process first by your request to have your attorney present at the meeting and later by your request for a DSEA representative to be present. Therefore, as of today's date no meeting has been set.

If you have a DSEA representative at the meeting he/she can only be an observer. The representative cannot be a participant in the meeting. If you haven't met with me prior to March 25, 2004 to develop your Improvement Plan we will meet to review the Improvement Plan that I develop. I have scheduled a meeting at 9:30 a.m. on Thursday, March 25, 2004 in my office to review the plan. The DPAS I procedure for the development of the Individual Improvement Plan will be followed. Your cooperation in this matter is critical to your professional improvement.

Sincerely,

Sandra Walls-Culotta, M.Ed.

Principal

c: Personnel File

Carol Schreffler, Assistant Superintendent

My signature below certifies that I have received this letter. It does not indicate agreement or disagreement

with the contents of the letter.

Signature and Date:

P.O. BOX 351 • GEORGETOWN DE • 19947 • 302-856-0961 • FAX 302-856-1760 • www.sussexvt.k12.de.us

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Sussex Technical High School

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Allen F. Lathbury, Jr. M.Ed Assistant Principal Steven W.F. Huber, M.Ed. Assistant Principal Larry J. Snyder, M.S. Assistant Principal William W. (Bill) Collick, M.Ed. Dean of Students

March 29, 2004

Dorothy Houlihan Sussex Tech High School Georgetown, DE 19947

Dear Dorothy:

Attached you will find your Improvement Plan that I developed because you did not agree to meet with me in a timely fashion. When I spoke with Mr. Holmes I discussed the Improvement Plan and that I would be designing it since you have failed to collaborate with me on the plan. According to DPAS if you fail to collaborate on the plan than I am to develop it. Please review the plan, sign it and return the signed copy to me by April 1, 2004. I will provide you with the video series when I receive the signed Improvement Plan.

You have failed to meet with me to develop your Improvement Plan that was requested in the letter dated March 8, 2004. You had requested a meeting first with your lawyer and then with a DSEA representative present. After speaking with Mr. Holmes, your request is for a meeting concerning the reprimand letters. Your request to meet concerning the reprimand letters does not allow you to postpone the meeting concerning your Improvement Plan. Your unwillingness to cooperate in the development of the Improvement Plan is another example of your inability to work as a team member.

Again, I am directing you to sign the letters dated March 8, 2004, March 22, 2004, this letter and your Improvement Plan. Your signature on these documents indicates that you have received them not that you agree with them. The Improvement Plan is in effect as of today's date. Continued refusal is insubordination and will have a negative effect on your contract renewal.

Sincerely.

Sandra L. Walls-Culotta, M.Ed.

Principal



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Page 2 3-30-04 Houlihan

c: Personnel File Carol Schreffler

My signature below certifies that I have received this letter. It does not indicate agreement or disagreement with the confents of this letter.

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Signature and Date

Individual Improvement Plan

Name_	Dorothy Houlihar	1	
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Directions: This Individual Improvement Plan shall be developed when an individual's performance in any category has been appraised as Needs Improvement or Unsatisfactory, of if a Lesson/Job Analysis is identified with the statement "Performance is Unsatisfactory". Selected category (s) of improvement will be checked below. Areas of growth shall address, but not be limited to the appropriate behaviors associated with any category. The plan shall be cooperatively developed by the teacher/specialist and the appraiser. If the plan cannot be cooperatively developed, the appraiser shall have the authority and responsibility to determine the plan. The teacher/specialist shall be held accountable for the implementation of the Individual Improvement Plan.

Category of Improvement:

I.	Planning/Preparation
п.	Organization and Management
m.	Strategies and Techniques
<u>X</u> _IV.	Specialist/Student/Staff Interaction
v.	Monitoring/Evaluating Student Performance
VI.	Related Responsibilities

I. Goals and Objectives:

- A. To significantly improve positive communication with staff.
- B. To work cooperatively with staff.

II. Activities and/or Methods to accomplish goals and objectives:

- A. Complete following video course: <u>Interpersonal Communication Skills</u>, Career Track
- B. Daily reflections of the day kept in a journal.
- C. Read Read Be A People Person by John C. Maxwell
- D. View video Communications: Negativity, Career Track

III. Resources

- The 7 Habits of Highly Effective People by Stephen Covey
- Be a People Person by John C. Maxwell

IV. Timelines

- Complete Interpersonal Communication Skills program by April 10, 2004.
- View <u>Communications: Negativity</u> by March 30, 2004.
- Copies of self-reflection journal will be submitted biweekly to supervising principal.

v.	Assessments	This 15
	 Period observations and copies of the journal will be assessed. 	de frior
Teach	er's Signature South AM	Date 41/04 mls
	iser's Signature Abula Millelield	Date 4/1/04 descer
c:	Carol Schreffler, Assistant Superintendent	request
	-	37 Bells -A